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April 10, 2004

Ms. Madelynn M. Lane
Assistant Branch Chief
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Lane:

On behalf of MoveOn.org Voter Fund this letter serves as a request for the Commission to approve the enclosed electronically created version of Form 9 that has been submitted on behalf of MoveOn.org Voter Fund to the Commission.

We believe that the Commission should approve the attached form for several reasons. First, based upon the fact that the Commission permits filing of Form 9 by both facsimile and email, the Commission should grant broad discretion to committees so that such forms can be submitted using Microsoft Office products that can easily be attached to an email. Second, the form supplies all of the information required by Form 9 in a readable and organized fashion. Third, the volume of the information on Form 9 is so large that requiring MoveOn to submit such information on the Commission's Form 9 would be burdensome and impractical. Fourth, the Commission's form fails to account for situations where a communication is disseminated for several days and in multiple jurisdictions. The form supplied by MoveOn allows for easy identification of such scenarios. Fifth, since neither the FEC nor any commercial vendor has created any mechanism to prepare Form 9 electronically or through the use of commercial software, the Commission should allow any reasonable approach to preparation of this form.

Should the Commission not approve this form, the preparation of Form 9 would become much more burdensome and time consuming than it already is. The form is required to be submitted within 24 hours of the transmission of a communication. Requiring the form to be submitted using a different format or directly on Commission forms could jeopardize MoveOn.org Voter Fund's ability to file this form in a timely manner. At the onset of electioneering filings, our office was assured that any reasonable filing that utilizes Microsoft Office products would be permitted. I hope that your office continues to honor that representation.

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